

CCX 7-11-86
STATE OF INDIANA

STREAM POLLUTION CONTROL BOARD



INDIANAPOLIS 46206

1030 West Michigan Street
P.O. Box 1964

April 2, 1986

EPA Region 5 Records Ctr.



294573

VIA CERTIFIED MAIL

Hon. Dallas L. Winchester, Mayor
City of Wabash
City Hall
Wabash, IN 46992

Dear Mayor Winchester:

Re: NPDES Permit No. IN 0024741
Industrial Plant Outfall #204

Your application for modification of the above-referenced discharge permit has been processed in accordance with Sections 402 and 405 of the Federal Water Pollution Control Act as amended by PL 92-500 and PL 95-217, (33 U.S.C. 1251, et seq.), and Public Law 100, Acts of 1972, as amended (IC 13-7, et seq., the "Environmental Management Act").

The revised page number 5 of 14 is enclosed and is intended to replace Page 5 of 14 of the existing permit. An accompanying Briefing Memo itemizes and explains the rationale for the revisions.

The enclosed NPDES Permit Amendment covers your existing NPDES Permit No. IN 0024741. All discharges from the referenced facility shall be consistent with the terms and conditions of this permit, as amended. Note that any appeal must be filed under procedures outlined in 330 IAC 5-16. The appeal must be initiated by filing with the Indiana Stream Pollution Control Board a request for an adjudicatory hearing within 30 days of receipt of this letter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "E.A. Bohner".

Earl A. Bohner
Technical Secretary

RAK/bt

Enclosure

cc: Chief, Permit Section, U.S. EPA
Wabash County Health Department
Container Corporation of America-Wastewater Treatment
Plant Operator

Permit No. IN 0024741

INDIANA STREAM POLLUTION CONTROL BOARD
AMENDED AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended by PL 92-500 and PL 95-217, (33 U.S.C. 1251 et seq.; the "ACT"), and Public Law 100, Acts of 1972, as amended (IC 13-7 et seq.; the "Environmental Management Act"), the National Pollutant Discharge Elimination System (NPDES) discharge Permit No. IN 0024741, issued March 29, 1985, to the City of Wabash, located at 700 South Carrol Street, Wabash, Indiana, is hereby amended by the relaxation of mass limitations for outfall #204, as noted on amended page 5 of 14 of the permit.

All terms and conditions of the existing permit not modified by this document will remain in effect. Further, any existing term or condition which this modification will change will remain in effect until any legal restraint to the imposition of this modification has been resolved.

This amendment shall become effective on the date of the signature of the Technical Secretary.

This amendment shall expire at midnight, February 28, 1990.

Signed this 27 day of March, 1986, for the
Indiana Stream Pollution Control Board.



Technical Secretary

3. During the period beginning on the effective date of this modification and lasting until the expiration date, the permittee is authorized to discharge from outfall(s) 204 (Municipal/Industrial Plant). Such discharge shall be limited and monitored by the permittee as specified below:

Discharge Limitations

Effluent Characteristic	lbs/day	lbs/day	Other Limitations		Measuring Requirements	
	Daily Average	Daily Maximum	Daily Average	Daily Maximum	Measurement Frequency	Sample Type
Flow (MGD)	--	--	--	--	5 X Weekly	Continuous
CBOD ₅ **	--	--	(Monitor Only)		Weekly	24-Ir. Comp.
TBOD ₅	1,025	2,050	--	--	5 X Weekly	24-Ir. Comp.
Total Suspended Solids	1,667	3,250	--	--	5 X Weekly	24-Ir. Comp.
Fecal Coliform*	--	--	200/100 ml	400/100 ml	5 X Weekly	Grab

*Calculated as a geometric mean. (From April 1 to October 31)

**See similar note on Page two (2) of this permit concerning CBOD₅ analysis.

- a. The pH shall not be less than 6 nor greater than 9. The pH shall be monitored by grab sample five times weekly.
- b. The effluent shall be disinfected on a continuous basis from April 1 to October 31. If disinfection by chlorine is used, a chlorine residual shall be maintained at a concentration not to exceed a maximum of 1.0 mg/l. Effluent disinfection is not required and should not be practiced November 1 through March 31. The permittee is required to undertake a program of chlorine minimization by reducing the amount of chlorine used to the greatest extent possible.

This program shall begin on the day of the first required total residual chlorine (TRC) and fecal coliform analyses that follows the effective date of the permit and on the first day of each succeeding disinfection season. It shall be operated in an ongoing manner and continued through the final day the permittee is required to disinfect.

The following procedure shall be considered as the minimum requirements of an acceptable program. Grab samples for TRC and Fecal Coliform analyses shall be taken simultaneously from the effluent end of the chlorine contact tank or, if terminal ponds are in place, the Fecal Coliform grab sample shall be taken at the outlet from the pond and the TRC grab from the effluent end of the chlorine contact tank. Results of these TRC and fecal coliform analyses, when completed, shall be compared and the rate or quantity of chlorine adjusted accordingly until the minimum amount is utilized to comply with fecal coliform limits.

Briefing Memo
December 1985

City of Wabash
700 South Carrol Street
Permit No. IN 0024741
Renewal Permit Issued: 3/29/85
Expires: 2/28/90

Effluent Limitations (Modification) Rationale

As a result of changes that occurred in the public noticed permit prior to issuance (March 29, 1985), the Container Corporation of America (CCA) requested a permit Modification/Adjudicatory Hearing on May 30, 1985, in order to modify specific permit requirements for the combined municipal/industrial plant (Outfall #204) that they felt were unjustified and inappropriate. CCA is a directly affected party since they are the legal owners of the combined facility while the City of Wabash is the operator of the combined municipal/industrial plant.

The Post Public Notice Modification mentioned above resulted in the change from the combined municipal/industrial plant having a municipal classification to having an industrial classification. Along with the industrial classification went the daily maximum discharge limitations requirement in place of the weekly average limitation for a municipal plant. This change was based upon the fact that this combined plant is dedicated primarily to the treatment of CCA wastewater. CCA has stated (after renewal of the permit) that since the issuance (November 8, 1974) of the expired permit production has increased from 311 T/D to 349.5 T/D while a higher BOD₅ and solids loading has also occurred due to the use of up to 50% of the Mill's furnish coming from old corrugated. Furthermore, as a result of all these combined occurrences numerous violations would have and will continue to occur under the present classification and the outdated production based limitations that were determined by an agreement between the State, EPA, City of Wabash and CCA. Therefore, CCA has requested the higher mass loadings based on current U.S. EPA technology based Effluent Limitations Guidelines (40 CFR Part 430.50) based on a 50-50 mix of corrugated and non-corrugated furnish.

Over looking the fact that neither the city nor CCA bothered to check the renewal application, proposed permit or fact sheet for accuracy, staff requested the modeling section of the ISBH to evaluate the water quality impact on the Wabash from the new loadings based on the 349.5 T/D of product produced utilizing the revised version of the Qual-1 steady state model. This model was used for the 1975 WLA for the Wabash River extending from Huntington to Lafayette. This evaluation indicated there should be no noticeable impact on the Wabash River from the increased loadings. Therefore, staff is proposing to modify the permit to include current BPT loadings based on the aforementioned facts. The following table lists current limitations and proposed (BPT) limitations.

	<u>Existing</u> <u>D.Ave. (D. Max.)</u>	<u>Proposed</u> <u>D.Ave. (D. Max.)</u>
BOD ₅	1,025 #/D (1,538 #/D)	1,503 #/D (3,041 #/D)
TSS	1,667 #/D (3,250 #/D)	2,481 #/D (4,963 #/D)

The stream survey section of the ISBH is tentatively planning on a summer of 1986 stream survey for the upper reaches of the Wabash as a continuing effort to determine the water quality impact on the river from direct municipal and industrial dischargers. If the results of this stream survey contradict the steady state model results and show that the mass loadings from the CCA plant are having a detrimental impact on the Wabash river the permit shall be modified without public notice or opportunity of hearing to incorporate the results of the WLA study.

Post Public Notice (Mod.) Addendum - March 1986

EPA, Region V, in their letter dated March 7, 1986, to Mr. Bohner, has objected to the proposed relaxation of BOD₅ and TSS limitations for outfall #204 for the following reasons.

- a. Review of 15 months of DMR data indicates that the discharge from this internal outfall can consistently meet (at a 95% level) the currently specified limitations, and as such, no demonstration of need to relax limitations has been made under the nondegradation policy of Indiana WQS (330 IAC 1-1-2).
- b. The existing limitations, which were apparently based on a BPJ determination under 402(a)(1) of the CWA, have been consistently achieved. Therefore, in accordance with 40 CFR 122.44(1), these limitations must be maintained.

As a result of the aforementioned comments received from EPA, Region V, the permit modification for increasing BOD₅ and TSS mass limitations are not being approved as proposed. Instead, the mass limitations as contained in the renewal permit (page 5 of 14) dated March 28, 1985, have been retained with the exception of the BOD₅ daily maximum mass limitation. The final BOD₅ daily maximum limitation to be issued in place of the 3,041 pounds per day will be 2,050 pounds per day. This mass limitation of 2,050 pounds per day is in accordance with ISPCB permitting procedures which provides for a two fold increase in allowance between the daily average and daily maximum limitations for industrial discharges. EPA has stated that they will approve of this type of increase at this time.

The second paragraph, first sentence of the Briefing Memo should read "The Post Public Notice Modification request mentioned above...".

Modification drafted by: Robert Kelsey

IND

NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES) PERMIT PROGRAM

PUBLIC NOTICE

Issuance of a NPDES Permit to Discharge into Waters of the State

Indiana Stream Pollution Control Board
1330 West Michigan Street
Indianapolis, IN 46206
317/633-0795

Public Notice Number: SM6515RI

Public Notice Issued On:

April 9, 1986

Permit No.: IN 0024741

Name and Address of Permittee:

Name and Address of Facility
Where Discharge Occurs:

City of Wabash
City Hall
Wabash, IN 46992

City of Wabash
Wastewater Treatment
700 South Carrol Street
Wabash, IN 46992

I. Permit Information

You are hereby notified that the Technical Secretary of the Indiana Stream Pollution Control Board issued an NPDES permit on March 27, 1986, to the above-named applicant to discharge wastewaters into the Wabash River in WABASH County, Indiana. The permittee operates two separate, parallel treatment plants. The issuance of this amendment involves the combined municipal/industrial plant with additional mass loadings approved for BOD₅(d.max). Plant operations result in an average discharge of 1.2 million gallons per day of treated sanitary and industrial wastewater. Parameters to be monitored and/or limited include: flow, CBOD₅, fecal coliform, pH, TBOD₅, and TSS, pursuant to applicable State and Federal law. The above-named State waters, into which the discharge is made, are classified for partial-body contact recreation and aquatic life in accordance with State water quality standards.

II. Appeal Procedures

Within fifteen (15) days after the date of publication of this notice, any person aggrieved by the issuance of the above-referenced permit may appeal in writing to the Indiana Stream Pollution Control Board for an adjudicatory hearing on the question of whether the permit has been issued in accordance with applicable law.

Such a written request for an adjudicatory hearing must:

- (1) state the name and address of the person making the request;

- (2) identify the interest of the person making the request;
- (3) identify any persons represented by the person making the request;
- (4) state with particularity the reasons for the request;
- (5) state with particularity the issues proposed for consideration at the hearing; and
- (6) identify the permit terms and conditions which, in the judgment of the person making the request, would be appropriate to satisfy the requirements of the law governing permits of the type granted or denied by the Technical Secretary's action.

Any such request shall be mailed or delivered to:

Mr. Earl A. Bohner, Technical Secretary
Indiana Stream Pollution Control Board
1330 West Michigan Street
Indianapolis, IN 46206

III. General Information

Copies of the issued NPDES permit, the permit application, and other related documents are on file and may be inspected in Room 334, Indiana State Board of Health, 1330 West Michigan Street, Indianapolis, Indiana, at any time between 9:00 a.m., and 4:00 p.m., Monday through Friday. Copies of this Public Notice and the proposed permit are available at the Indiana State Board of Health. These documents may be copied at a cost of 15c per page. Please bring the foregoing to the attention of persons whom you know would be interested in this matter.

PN/Wabash MONIAM

Post Public Notice Addendum - 2/26/85

Due to comments received during the Public Notice period and a change in ISBH policy regarding bypass/overflow points from a sanitary sewer system, several outfalls have been added. Included under Attachment A (which reflects new wording) for CSO's and Bypassing Authorization and Emergency Bypassing are outfalls 009 through 011.

The expiring permit classified the combined Municipal/Industrial plant (outfall 004B) as a Class III Municipal based mainly on the fact that the City is the operator and the operator is required under State and Federal Regulations to obtain a permit. However, due to that fact that the plant is dedicated to the treatment of CCA wastewater and discharge limitations are reflective of Industry standards and not Municipality standards, an Industrial classification is now being made. Therefore, on pages 2 and 5 of the permit for outfall 004B, the plant classification (previously Class III Municipal and now a Class C Industrial) and the discharge limitations (from monthly to daily average and from weekly to daily maximum) have been changed to reflect the new Industrial classification.

As a result of some of the aforementioned changes, the Fecal Coliform notation on Page 7 has been deleted and added on Page 2 and Page 5 (to be "calculated as a geometric mean.") in the permit.

A paragraph on the bottom of Page 4 in the Permit was added in response to comments received by U.S. EPA (Region V). The Pretreatment Program for the City of Wabash has not been approved yet. Pretreatment requirements shall become effective when the U.S. EPA and the State of Indiana approve the permittee's program.

Outfall numbers 004A and 004B have been changed to 104 and 204, respectively, due to tracking difficulties. Both outfalls discharge thru 004.
Drafted by R. A. Kelsey

WPC 29L/e
3/7/85